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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Rosmery De La Caridad Cruz Berrillo and  
Taylor Brittany Austin Cruz,

Plaintiff,

v.

ROBERT COWAN, Director, National  
Benefit Center, U.S. Citizenship and  
Immigration Services, in his official capacity  
as well as his successors and assign;  
ALEJANDRO MAYORKAS, Secretary,  
U.S. Department of Homeland Security, in  
his official capacity as well as his successors  
and assigns; UR MENDOZA JADDOU,  
Director, U.S. Citizenship and Immigration  
Services, in her official capacity as well as  
her successor and assigns;

Defendants.

Case No. 2:24-cv-00210-CDS-EJY

**Stipulation and Order**

**(First Request)**

Plaintiffs Rosmery De La Caridad Cruz Berrillo and Taylor Brittany Austin Cruz  
and Defendants Robert Cowan, Director, National Benefit Center, U.S. Citizenship and  
Immigration Services, Alejandro Mayorkas, Secretary of US Department of Homeland  
Security, and Ur M. Jaddou, Director of U.S. Citizenship and Immigration Services,  
United States Citizenship and Immigration Services (“Federal Defendants”), hereby  
stipulate and agree as follows:

Plaintiffs filed their Complaint on January 30, 2024.

1 Plaintiffs served the United States with a copy of the Complaint via Certified Mail  
2 on February 12, 2024.

3 The current deadline for the United States to respond to the Plaintiffs' Complaint is  
4 on April 12, 2024.

5 Plaintiffs and Federal Defendants, through undersigned counsel, stipulate and  
6 request that the Court approve a 60-day extension of time, from April 12, 2024, to June 11,  
7 2024, for Federal Defendants to file a responsive pleading to the Complaint, ECF No. 1.  
8 This is the first request for an extension of time. The extension is necessary for the Las  
9 Vegas Field Office to receive the files for these applicants and to conduct the initial review  
10 of these files.

11 Therefore, the parties request that the Court extend the deadline for the United States  
12 to answer or otherwise respond to June 11, 2024.

13 This stipulated request is filed in good faith and not for the purposes of undue delay.

14 Respectfully submitted this 2nd day of April, 2024.

15 JASON M. FRIERSON  
16 United States Attorney

17 /s/ Maria Quiroga  
18 MARIA QUIROGA, ESQ.  
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22 *Attorney for Plaintiffs*

23 /s/ Virginia T. Tomova  
24 VIRGINIA T. TOMOVA  
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IT IS SO ORDERED:

23   
24 DAYNA J. ZOUCHEK  
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: April 2, 2024  
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